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December 6, 2024

VIA ECFMagistrate Judge Peggy Kuo
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn NY 11201**Re: *State Farm Mut. Auto. Ins. Co. v. Metro Pain Specialists P.C.*, 21-cv-5523 (E.D.N.Y.) –
Proposed Notice of Hassan Deposition**

Dear Judge Kuo:

Pursuant to this Court's Text Order entered December 5, 2024 (the "Order"), Plaintiffs State Farm Mutual Automobile Insurance Co. and State Farm Fire and Casualty Co. (collectively, "Plaintiffs") write to submit the attached proposed notice of deposition directed to defendant Mohamed Sayed Ahmed Hassan, P.T. ("Hassan") for the Court to so-order. Ex. 1 (Proposed Notice of Deposition).

As there are outstanding discovery deficiencies with Hassan's written responses and document productions, Plaintiffs respectfully request the Court separately order Hassan to cure those deficiencies consistent with the relief requested in Plaintiffs' motion to compel (Dkt. 552) no later than December 24, 2024. These written responses and documents are important to Plaintiffs' ability to completely depose Hassan and, should he fail to serve written discovery responses and produce documents by the date so-ordered by the Court, Plaintiffs would seek entry of default judgment as to Hassan and his corporate defendant, Nile Rehab Physical Therapy, P.C., which is already in default as it is unrepresented and has been since July 2, 2024. *See* 7/2/2024 Text Order.

Respectfully submitted,

/s/ Christopher T. Cook

Christopher T. Cook

Encl. (Exhibit 1)